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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS OPPOSITION  
TO DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO, LLC'S MOTION TO  
EXCLUDE ONE OF THREE OPINIONS  
PROFFERED BY WAYMO EXPERT JIM  
TIMMINS**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal (“Waymo’s Administrative Motion”) confidential information in its Opposition to Defendants Uber Technologies, Inc.’s and Ottmotto LLC’s Motion to Exclude One of Three Opinions Proffered by Waymo Expert Jim Timmins. Waymo’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Supplemental Brief in Support of its Motion for Order to Show Cause (“Waymo’s Brief”)	Highlighted in blue	Defendants
	Highlighted in yellow	Anthony Levandowski; other third-parties
Exhibit 1 to Waymo’s Brief	Entire document	Defendants; other third-parties
Exhibit 2 to Waymo’s Brief	Entire document	Defendants; other third-parties
Exhibit 3 to Waymo’s Brief	Entire document	Other third-parties
Exhibit 4 to Waymo’s Brief	Entire Document	Anthony Levandowski; other third-parties
Exhibit 5 to Waymo’s Brief	Highlighted portions	Other third parties
Exhibit 6 to Waymo’s Brief	Entire Document	Other third parties
Exhibit 7 to Waymo’s Brief	Highlighted portions	Other third-parties
Exhibit 8 to Waymo’s Brief	Highlighted portions	Other third parties
Exhibit 9 to Waymo’s Brief	Highlighted portions	Anthony Levandowski; other third-parties

3. Waymo’s Opposition and exhibits contain information that Defendants and/or non-party Mr. Levandowski and/or other third-parties have designated as confidential and/or highly confidential.

4. Waymo takes no position on the merits of sealing the designated material, and expects Defendants and/or Mr. Levandowski and/or other third-parties to file one or more declarations in accordance with the Local Rules.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
2 true and correct, and that this declaration was executed in San Francisco, California, on September 22,  
3 2017.

4 By /s/ Lindsay Cooper  
5 Lindsay Cooper  
6 Attorneys for WAYMO LLC

7  
8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
10 filing of this document has been obtained from Lindsay Cooper.

11 /s/ Charles K. Verhoeven  
12 Charles K. Verhoeven